



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

AVESF 1.1.1

Piggy Back Doug

2110 Ironwood Parkway, Coeur d'Alene, ID 83814-2648, (208) 667-3524

Cecil D. Andrus, Governor

Richard P. Donovan, Director

MEMORANDUM

September 4, 1991

To: Paul Jehn, GW Manager
Doug Conde, Asst. Attorney General

From: Brian Painter, Env. Hydrogeologist
Lisa Prochnow, WQ Specialist
Steve Tanner, WQ Field Supervisor

RE: Avery Landing Site - Product Characterization

Attached is the most recent letter from Potlatch requesting that DEQ provide the specifications that the product must meet to be considered waste oil for burning rather than a hazardous waste. All parties involved are very sensitive to this issue since the characterization will be factored highly in the economic considerations of site clean up. According to Potlatch this determination has the potential to kill the entire clean up effort on their part.

We are most unfortunate at this point in time since Richard Clearman left DEQ, he had a very good understanding of the federal regulations on waste oil burning. Now we must involve other Haz Mat bureau staff to assist us in making this determination.

We are depending on Boise staff to communicate this need for Haz Mat assistance to that bureau. We can assist them in the field by going to the site during sampling and collecting a split sample for our own analysis if they feel that is needed. The Haz Mat Bureau must give Potlatch direction on this sampling and the analyses needed. Once the sample is analyzed their determination of the classification of product will be crucial.

We feel we are close to a solution since Doug was able to bring CMC to the table and we would like to make this sampling and determination effort as timely and clean as possible. With speed we may be able to beat the snow and get Potlatch going on remediation.

RRG

USEPA SF



1420364

*Called Mike Fish
let him know
response is
coming from HAZ MAT*

*Haz
Mat
WQ*

*Thursday
Sept. 10th
Call Clyde
506 79*